

Halprin Temple  
1317 F Street N.W., 4<sup>th</sup> Floor  
Washington, D.C. 20004

February 15, 2008

**Via ECFS**

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12th Street, S.W. Suite TW-A325  
Washington, DC 20554

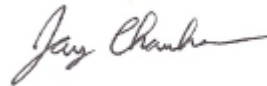
**RE: EB Docket No: 06-36, 2008 CPNI  
Certification for 499 Form Filer ID: 820876**

Dear Ms. Dortch:

Telecom New Zealand (USA) Ltd. ("TNZ USA"), through its attorneys and pursuant to Section 64.2009(e) of the Commission's Rules, hereby submits its CPNI compliance certificate and accompanying statement explaining the procedures in place.

If you have any questions or concerns about the certification, please contact the undersigned.

Sincerely,



Jay Chauhan

cc: Enforcement Bureau, Telecommunications Consumers Division (2  
copies)  
Best Copy Printing, Inc. via e-mail [FCC@BCPIWEB.COM](mailto:FCC@BCPIWEB.COM)

Annual 47 C.F.R. S: 64.2009(e) CPNI Certification - 2007  
EB Docket 06-36

Date filed: February 15, 2008  
820876


Form 499 Filer ID:

I, Laurie Miller, certify that I am an officer of Telecom New Zealand (USA) Ltd. (TNZ USA), and acting as an agent of the company, that I have personal knowledge that TNZ USA has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 et seq. of the Commission's rules.  
*See Exhibit A.*

The company has not taken any actions against data brokers in the past year.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Signed 

Date: February 15, 2008

Name: Laurie Miller  
Manager

Title: President and Country

Contact Person: Laurie Miller

Telephone: (626) 432-4300

#### **47 C.F.R. 64.2009 Compliance Certificate Accompanying Statement**

Telecom New Zealand (USA) Ltd. (TNZ USA) has implemented a system that the status of a customer's CPNI approval can be clearly established prior to the use of CPNI.

TNZ USA has trained its personnel as to when they are, and are not, authorized to use CPNI with an express disciplinary process in place.

TNZ USA maintains a record of its own and its affiliates' sales and marketing campaigns that use its customers' CPNI. TNZ USA further maintains a record of all instances that CPNI was disclosed or provided to third parties, or that third parties were allowed access to CPNI. Such records conform to the requirements of 47 C.F.R. 64.2009 and are maintained for the minimum period of one year. It should be noted however, that TNZ USA is a reseller that only sells its services to other carriers. As such, TNZ USA has no end user customers.

As stated above, TNZ USA is a reseller only and does not undertake any outbound marketing.

TNZ USA has a procedure in place to notify the Commission within five business days of any instance that the opt-out mechanisms do not work properly as required by 47 C.F.R. 64.2009.